

**— EXHIBIT 3 —**

**From:** [Michael R. O'Donnell](#)  
**To:** [Brittany Resch](#); [Min Ro](#); [kissingera@ballardspahr.com](#); [schilkene@ballardspahr.com](#); [Schilken, Elizabeth L.](#)  
**Cc:** [Michael Ram x20021](#); [Benjamin Osborn](#); [Docketing](#); [Stephanie D. Edelson](#); [Michael P. O'Mullan](#)  
**Subject:** RE: [EXTERNAL]RE: Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)  
**Date:** Friday, November 15, 2024 3:35:38 PM  
**Attachments:** [image004.png](#)

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Brittany:

Again, we disagree and it was our understanding that 11/22 was agreed on both sets. We can continue to have a prolonged email back and forth on this subject or end it here with all our rights preserved and remember that we have extended each other courtesies through the litigations (and we are appreciative of the extensions you have given) and agree to continue to do so.

Mike

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**From:** Brittany Resch <bresch@straussborrelli.com>  
**Sent:** Friday, November 15, 2024 4:25 PM  
**To:** Michael R. O'Donnell <MODONNELL@RIKER.com>; Min Ro <mro@straussborrelli.com>; kissingera@ballardspahr.com; schilkene@ballardspahr.com; Schilken, Elizabeth L. <schilkene@ballardspahr.com>  
**Cc:** Michael Ram x20021 <MRam@forthepeople.com>; Benjamin Osborn <ben@benosbornlaw.com>; Docketing <docketing@straussborrelli.com>; Stephanie D. Edelson <SEDELSON@RIKER.com>; Michael P. O'Mullan <MOMullan@RIKER.com>  
**Subject:** RE: [EXTERNAL]RE: Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)

The record is clear. If you need more time, all you need to do is ask, and we will consider that.

Rules and deadlines matter because objections are waived if not submitted timely. Rule 33(b) (4) ("Any ground not stated in a timely objection is waived unless the court, for good cause, excuses the failure."); *Richmark Corp. v. Timber Falling Consultants*, 959 F.2d 1468, 1473 (9th Cir. 1992) (a failure to timely object to document requests constitutes a waiver of any objection).

Plaintiffs reserve all rights.

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**From:** Michael R. O'Donnell <MODONNELL@RIKER.com>  
**Sent:** Friday, November 15, 2024 3:14 PM  
**To:** Brittany Resch <bresch@straussborrelli.com>; Min Ro <mro@straussborrelli.com>; kissingera@ballardspahr.com; schilkene@ballardspahr.com; Schilken, Elizabeth L. <schilkene@ballardspahr.com>  
**Cc:** Michael Ram x20021 <MRam@forthepeople.com>; Benjamin Osborn <ben@benosbornlaw.com>; Docketing <docketing@straussborrelli.com>; Stephanie D. Edelson

<[SEDELSON@RIKER.com](mailto:SEDELSON@RIKER.com)>; Michael P. O'Mullan <[MOMullan@RIKER.com](mailto:MOMullan@RIKER.com)>

**Subject:** RE: [EXTERNAL]RE: Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)

That is not my understanding, and we are talking ten days.

Mike

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**From:** Brittany Resch <[bresch@straussborrelli.com](mailto:bresch@straussborrelli.com)>

**Sent:** Friday, November 15, 2024 4:12 PM

**To:** Michael R. O'Donnell <[MODONNELL@RIKER.com](mailto:MODONNELL@RIKER.com)>; Min Ro <[mro@straussborrelli.com](mailto:mro@straussborrelli.com)>; [kissingera@ballardspahr.com](mailto:kissingera@ballardspahr.com); [schilkene@ballardspahr.com](mailto:schilkene@ballardspahr.com); Schilken, Elizabeth L. <[schilkene@ballardspahr.com](mailto:schilkene@ballardspahr.com)>

**Cc:** Michael Ram x20021 <[MRam@forthepeople.com](mailto:MRam@forthepeople.com)>; Benjamin Osborn <[ben@benosbornlaw.com](mailto:ben@benosbornlaw.com)>; Docketing <[docketing@straussborrelli.com](mailto:docketing@straussborrelli.com)>; Stephanie D. Edelson <[SEDELSON@RIKER.com](mailto:SEDELSON@RIKER.com)>; Michael P. O'Mullan <[MOMullan@RIKER.com](mailto:MOMullan@RIKER.com)>

**Subject:** RE: [EXTERNAL]RE: Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)

Hi Mike – I believe you are referring to my Oct 31 email, attached, where we expressly agreed to set a deadline for the First set only. Not the Second set, which due dates are governed by the Federal Rules of Civil Procedure.

Thanks,  
Brittany

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**From:** Michael R. O'Donnell <[MODONNELL@RIKER.com](mailto:MODONNELL@RIKER.com)>

**Sent:** Friday, November 15, 2024 3:06 PM

**To:** Brittany Resch <[bresch@straussborrelli.com](mailto:bresch@straussborrelli.com)>; Min Ro <[mro@straussborrelli.com](mailto:mro@straussborrelli.com)>; [kissingera@ballardspahr.com](mailto:kissingera@ballardspahr.com); [schilkene@ballardspahr.com](mailto:schilkene@ballardspahr.com); Schilken, Elizabeth L. <[schilkene@ballardspahr.com](mailto:schilkene@ballardspahr.com)>

**Cc:** Michael Ram x20021 <[MRam@forthepeople.com](mailto:MRam@forthepeople.com)>; Benjamin Osborn <[ben@benosbornlaw.com](mailto:ben@benosbornlaw.com)>; Docketing <[docketing@straussborrelli.com](mailto:docketing@straussborrelli.com)>; Stephanie D. Edelson <[SEDELSON@RIKER.com](mailto:SEDELSON@RIKER.com)>; Michael P. O'Mullan <[MOMullan@RIKER.com](mailto:MOMullan@RIKER.com)>

**Subject:** RE: [EXTERNAL]RE: Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)

Brittany:

Per the 10/28 email below, the date the Answers are due is 11/22. Also please copy Mike O'Mullan and Stephanie Edelson on all emails. We all enjoy reading your emails. Have a nice weekend.

Mike

**From:** Brittany Resch <[bresch@straussborrelli.com](mailto:bresch@straussborrelli.com)>  
**Sent:** Thursday, October 31, 2024 12:40 PM  
**To:** Stephanie D. Edelson <[SEDELSON@RIKER.com](mailto:SEDELSON@RIKER.com)>  
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**Subject:** RE: [EXTERNAL]RE: Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)

Hi Stephanie and Mike – nice chatting with you just now. On the First set of written discovery, you stated you looked at the discovery and saw it was substantially similar to the set in Ohio. We will watch for responses to the First set of written discovery by Nov 22, 2024.

Thanks,  
Brittany

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**From:** Brittany Resch <[bresch@straussborrelli.com](mailto:bresch@straussborrelli.com)>  
**Sent:** Friday, November 15, 2024 9:41 AM  
**To:** Min Ro <[mro@straussborrelli.com](mailto:mro@straussborrelli.com)>; [kissingera@ballardspahr.com](mailto:kissingera@ballardspahr.com); [schilkene@ballardspahr.com](mailto:schilkene@ballardspahr.com); Michael R. O'Donnell <[MODONNELL@RIKER.com](mailto:MODONNELL@RIKER.com)>  
**Cc:** Michael Ram x20021 <[MRam@forthepeople.com](mailto:MRam@forthepeople.com)>; Benjamin Osborn <[ben@benosbornlaw.com](mailto:ben@benosbornlaw.com)>; Docketing <[docketing@straussborrelli.com](mailto:docketing@straussborrelli.com)>  
**Subject:** [EXTERNAL]RE: Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)

Counsel – Defendant's responses to these Second Sets of discovery are late. Please advise when we will receive responses. Plaintiff reserves all rights.

Thanks,  
Brittany

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**From:** Min Ro <[mro@straussborrelli.com](mailto:mro@straussborrelli.com)>  
**Sent:** Thursday, October 10, 2024 4:07 PM  
**To:** [kissingera@ballardspahr.com](mailto:kissingera@ballardspahr.com); [schilkene@ballardspahr.com](mailto:schilkene@ballardspahr.com); Michael O'Donnell <[MODONNELL@RIKER.com](mailto:MODONNELL@RIKER.com)>  
**Cc:** Brittany Resch <[bresch@straussborrelli.com](mailto:bresch@straussborrelli.com)>; Michael Ram x20021 <[MRam@forthepeople.com](mailto:MRam@forthepeople.com)>; Benjamin Osborn <[ben@benosbornlaw.com](mailto:ben@benosbornlaw.com)>; Docketing <[docketing@straussborrelli.com](mailto:docketing@straussborrelli.com)>  
**Subject:** Batis v. Dun & Bradstreet Holdings, Inc. (Case No. 3:22-cv-01924-MMC)

Counsel,

Attached please find **Plaintiff's Second Set of Interrogatories to Defendant Dun & Bradstreet Holdings, Inc.** and **Plaintiff's Second Set of Requests For Production to Defendant Dun & Bradstreet Holdings, Inc.** in the above matter.

Thank you,  
Min



**Min Ro** *She/Her*

Paralegal

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